

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KARINA L. MATOS	:	CHAPTER 13
Debtor	:	
	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Objectant	:	
	:	
vs.	:	
	:	
	:	
MICHAEL J. MCCRYSTAL, ESQUIRE	:	
Applicant	:	CASE NO. 5:21-00424-MCJ

TRUSTEE'S OBJECTION TO APPLICATION OF ATTORNEY
FOR CHAPTER 13 DEBTOR FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES

AND NOW, this 10th day of June, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by his attorney, Agatha R. McHale, who objects, pursuant to 11 U.S.C. § 330(a)(2), to the Application of Attorney for Chapter13 Debtor for Compensation and Reimbursement of Expenses and states as follows:

1. Objectant Jack N. Zaharopoulos is the duly appointed Trustee in this case.
2. On March 3, 2021, Debtor filed a Petition under Chapter 13 of the Bankruptcy Code. Applicant's Fee Application requests \$4,000.00 in fees and expenses.
3. On June 7, 2022, Applicant filed the Application for Compensation.
4. Applicant requests \$4,000.00 in fees.
5. Trustee cannot determine if the Fee Application is reasonable because Exhibit B is not attached to the Fee Application.

WHEREFORE, the Trustee respectfully requests this Honorable Court to set a hearing on the Application and, after hearing appropriately adjust Applicant's request for compensation.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee
amchale@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 10th day of June, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael McCrystal, Esquire
151 Main Street, Suite A
Emmaus, PA 18049

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee